

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

KARA REDDINGTON, as Administratrix )	
of the Estate of Daniel E. Reddington; )	
KARA REDDINGTON, as Mother and Next Friend )	
of DANIEL ERIC REDDINGTON, JR. and )	
COLE MADER REDDINGTON; and )	
KARA REDDINGTON, Individually, )	CIVIL ACTION
Plaintiffs )	NO. 07-CA-10765-GAO
)	
vs. )	
)	
U.S. TRUCK CRANES, INC., and )	
JLG INDUSTRIES, INC., )	
Defendants )	
)	

**JOINT DISCOVERY PLAN**

Pursuant to Local Rule 16.1 and the Court's Notice of Scheduling Conference Order, the parties (having conferred and agreed) hereby submit the following proposed discovery plan. Local Rule 16.1(D)(3) certifications have been filed separately.

**A. DISCOVERY SCHEDULE**

1. 09/02/07 – Initial Disclosures under Fed. R. Civ. P. 26(a)(1).
2. 10/02/07 - Motions pursuant to Rules 12, 13, 14, 15, 18 and 19
3. 11/02/07 – Service of Initial Discovery Requests under Fed. R. Civ. P. 33 and 34.
4. 03/31/08 - Depositions of named parties and fact witnesses
5. 03/31/08 - All motions regarding discovery disputes
6. 05/31/08 - Plaintiffs' Expert Disclosure
7. 07/15/08 - Deposition of Plaintiffs' Expert Witnesses
8. 07/31/08 - Defendant's Expert Disclosure
9. 08/31/08 - Deposition of Defendant's Expert Witnesses
10. 08/31/08 - Completion of Discovery

11. 11/15/08 - Dispositive Motions with Supporting Memoranda
12. Opposition to Dispositive Motions - 21 days after service of motion
13. Pretrial Conference and Trial Date to be scheduled after 11/15/08.

B. DISCOVERY GENERALLY

1. Interrogatories: A maximum of 25 interrogatories by each party to any other party.
2. Requests for Admission: A maximum of 25 Requests for Admission by each party to any other party.
3. Depositions: A maximum of 10 fact depositions by each party. Each fact deposition is limited to a maximum of 7 hours unless extended by agreement of the parties. The parties will be permitted to take an unlimited number of expert depositions. Expert depositions are limited to two 7 hour days unless extended by agreement of the parties. The plaintiff's experts in each particular field of expertise will be deposed first with the defendants' experts in each particular field of expertise to be deposed thereafter.
- 4: Alternative Dispute Resolution: The parties will consider mediation or other forms of alternative dispute resolution after initial discovery and an inspection of the product. The plaintiff shall present the defendant with a settlement demand by 8/31/07.
5. Trial Estimate: Two-three full weeks.  
The parties have conferred, considered and taken into account in this proposed discovery schedule their obligations to limit discovery and conduct phased discovery. There is no additional agreement between the parties at this time regarding ESI materials

or assertions of privilege beyond the manner in which those matters are provided for in the Federal Rules of Civil Procedure.

**KARA REDDINGTON, Individually  
and as Administratrix of the Estate  
of Daniel E Reddington, DANIEL ERIC  
REDDINGTON, JR., and COLE MADER  
REDDINGTON,**

By their Attorneys,

LEAVIS & REST, PC

/s/ Deborah M. Santello  
Paul F. Leavis BBO # 290580  
Deborah M. Santello BBO # 555431  
83 Central Street  
Boston, MA 02109  
617-742-1700

**JLG INDUSTRIES, INC.**

By its Attorneys,

CAMPBELL CAMPBELL  
EDWARDS & CONROY, PC

/s/ Kiley M. Belliveau  
James M. Campbell BBO # 541882  
Kiley M. Belliveau BBO # 661328  
One Constitution Plaza  
Boston, MA 02129  
617-241-3000

#### **CERTIFICATE OF SERVICE**

I, Kiley M. Belliveau, of Campbell Campbell Edwards & Conroy, P.C., attorney for JLG Industries, Inc., hereby certify that on May 14, 2007, a true copy of the above document was served upon the following counsel of record via the ECF/CM System:

Paul F. Leavis, Esq.  
Deborah Santello, Esq.  
Leavis and Rest, P.C.  
83 Central Street  
Boston, MA 02109

I certify that a true copy of the above document was served upon the following party by First Class Mail:

U.S. Truck Cranes, Inc.  
30 West & Bowman Road  
R.D. 6 Box 34-B  
York, Pennsylvania

/s/ Kiley M. Belliveau  
Kiley M. Belliveau